

**From:** Nick Parker <npcaparker@hotmail.com>

**Sent:** 15 June 2026 11:10

**To:** Developmentmanagement <Developmentmanagement@wiltshire.gov.uk>

**Subject:** Application Reference PL/2026/03056 - Entrance

Good Morning

I wish to object to Speculative Planning Application PL/2026/03056. My objection includes photos which unfortunately your online form will not include. I phoned your office and was advised to send the objection through this means. Thank you.

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### **OBJECTION TO PLANNING APPLICATION PL/2026/03056**

I wish to register my strongest objection to Planning Application **PL/2026/03056**.

This objection is supported by:

- **Appendix 1:** Photographs of the north and south aspects of the historic entrance.
- **Appendix 2:** Drone topographical survey evidencing level differences and one of the lowest point at the proposed entrance.
- **Appendix 3:** Historic mapping (Promap) illustrating the historic enclosure and land use.

### **Summary of Objection**

The application is based on an inaccurate understanding of the historic function and significance of the existing entrance and fails to provide sufficient information to enable the Local Planning Authority to discharge its statutory duties under the **Planning (Listed Buildings and Conservation Areas) Act 1990**, particularly Sections **16 and 66**.

It also fails to properly assess the full scope of development required to implement the proposal, including excavation, regrading, drainage implications, and their consequent impacts on heritage assets, archaeology, structural stability, and flood risk.

The proposal is therefore contrary to:

- **Sections 16 and 66, Planning (Listed Buildings and Conservation Areas) Act 1990**
- **NPPF (December 2024), Chapter 16**, particularly paragraphs **202, 207, 212 and 214**
- **Wiltshire Core Strategy Policies CP51, CP57 and CP58**

### **1. Misrepresentation of Historic Function**

The application incorrectly implies that the existing opening has historically functioned as a pedestrian access. It has not.

The entrance forms part of the original historic boundary serving the former market garden. Historic mapping, including the applicant's own evidence (Lichfields Report Figure 6), confirms that the surrounding land remained enclosed in 1975. There is no evidence of a public right of way or historic pedestrian route across this land, and access has historically been controlled by successive landowners.

The significance of the entrance therefore lies in its agricultural and boundary function within a historic market garden system. This significance has not been properly identified or assessed, contrary to **NPPF paragraph 207**.

## **2. Harm Through Change of Historic Function**

The proposal seeks to convert a historic agricultural entrance into a permanent pedestrian access serving a modern residential development.

This represents a material change to the historic function of part of a designated heritage asset and therefore alters its significance and interpretation.

Under Sections 16 and 66 of the 1990 Act, the Council must give special regard to preserving the listed wall, its setting, and features of special interest. The NPPF requires that “great weight” be given to conservation of designated heritage assets, and that any harm must be clearly justified and outweighed by public benefit.

The **Wiltshire Council Heritage Impact Assessment (2018)** identifies:

- The near-continuous wall along Boreham Road as a defining historic feature
- Its contribution to the historic relationship between Warminster and Bishopstrow
- That new accesses through this boundary may be harmful and difficult to mitigate

The current application does not adequately assess or justify this degree of harm.

## **3. Engineering Works as Integral Development**

The assessment of this application is incomplete because it considers only the alteration to the listed wall, rather than the full engineering works required to make the access functional.

Significant level differences mean substantial **excavation, regrading, and potential drainage works** will be required.

These works are integral to the proposal and would likely result in:

- Removal of supporting ground adjacent to the listed wall foundations
- Potential destabilisation of historic boundary structures and adjacent listed features (including curtilage assets such as the historic well and west wall at The Cotes)
- Permanent alteration of historic landform contributing to setting and significance
- Risk of disturbance to archaeological deposits, including known Mesolithic flint-working evidence
- Changes to groundwater and surface water movement

The applicant has not provided sufficient technical or heritage evidence to demonstrate that these impacts can be avoided or mitigated. The Council must assess the proposal as a whole, including all enabling works.

## **4. Flood Risk and Surface Water Drainage**

The topographical evidence shows the entrance lies at a natural low point within the site and the field already experiences water accumulation during periods of heavy rainfall.

Further excavation and regrading risk creating a preferential flow path towards Boreham Road, increasing surface water discharge onto the highway.

There is limited existing drainage infrastructure capable of intercepting such flows.

This raises concerns under **NPPF Chapter 14, paragraph 175**, requiring that development must not increase flood risk elsewhere and must remain safe for its lifetime.

## **5. Unclear Relationship to Drainage Infrastructure**

Information presented during the developer's public consultation (November 2025) suggested that an overflow connection from the proposed attenuation pond may require linkage to existing drainage infrastructure beneath Boreham Road.

It was indicated that the historic entrance may represent the most direct route for such infrastructure.

If the proposed opening is intended to accommodate drainage infrastructure, service runs, or maintenance access, this has not been clearly set out in the application.

The Council cannot properly assess heritage, engineering, or flood risk impacts without full disclosure of all associated works.

#### **6. Incomplete Heritage Assessment**

The application fails to adequately assess:

- Impact on the significance of the listed boundary wall
- Impact on curtilage features (including historic well and enclosure features)
- Impact on the setting of the listed wall and adjacent listed structures
- Effects of excavation and level changes
- Archaeological implications of ground disturbance
- Cumulative impact of drainage and engineering works
- Whether any public benefits outweigh identified harm

The submitted information is therefore insufficient to discharge statutory duties under Sections 16 and 66 of the 1990 Act or to properly apply the NPPF heritage balance.

#### **Conclusion**

The proposal is presented as a minor alteration to a listed wall. In reality, it would facilitate the conversion of a historic market garden entrance into a modern pedestrian access serving a substantial residential development, requiring significant and intrusive engineering works.

The applicant has not demonstrated that the proposal would preserve the significance of the listed building or its setting, nor that any harm would be outweighed by public benefit. In the absence of adequate assessment, the Local Planning Authority cannot properly discharge its statutory duties.

I therefore respectfully request that **Planning Application PL/2026/03056 be refused.**

#### **Appendices**

#### **Appendix 1**

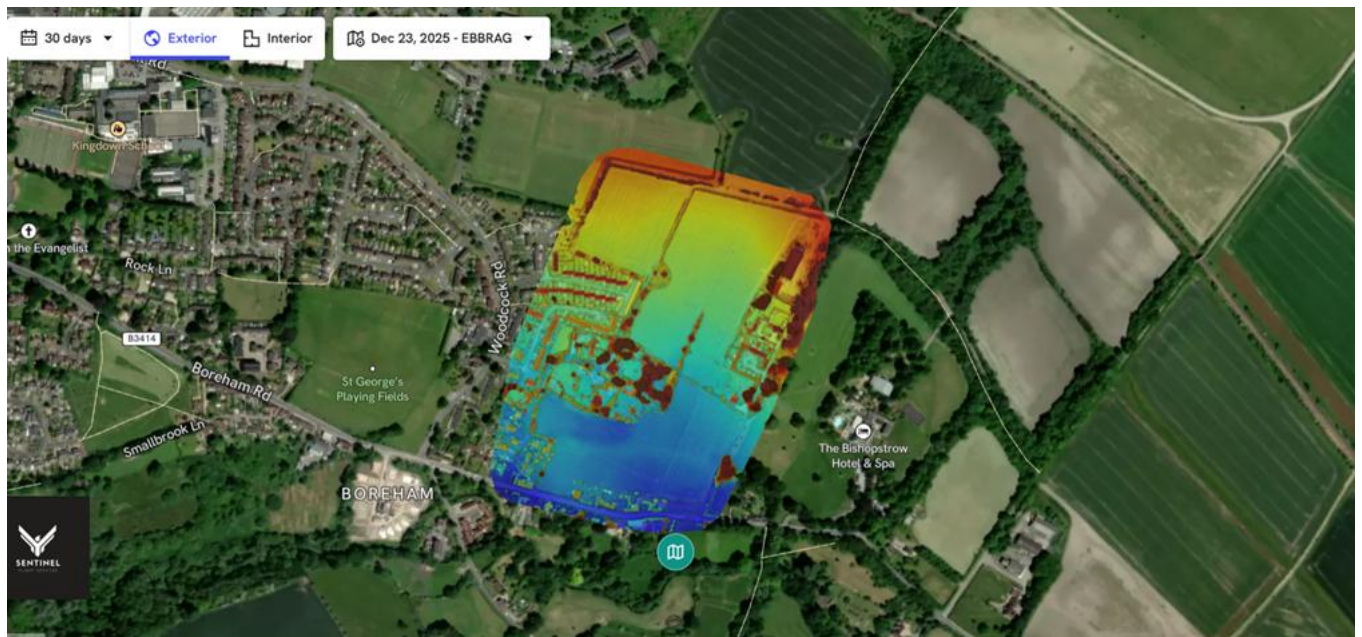


1. Photo of north side of entrance showing height of land and relationship to the Cotes listed western wall.



Picture of entrance from Boreham Road – not an agricultural vehicle or pedestrian access.

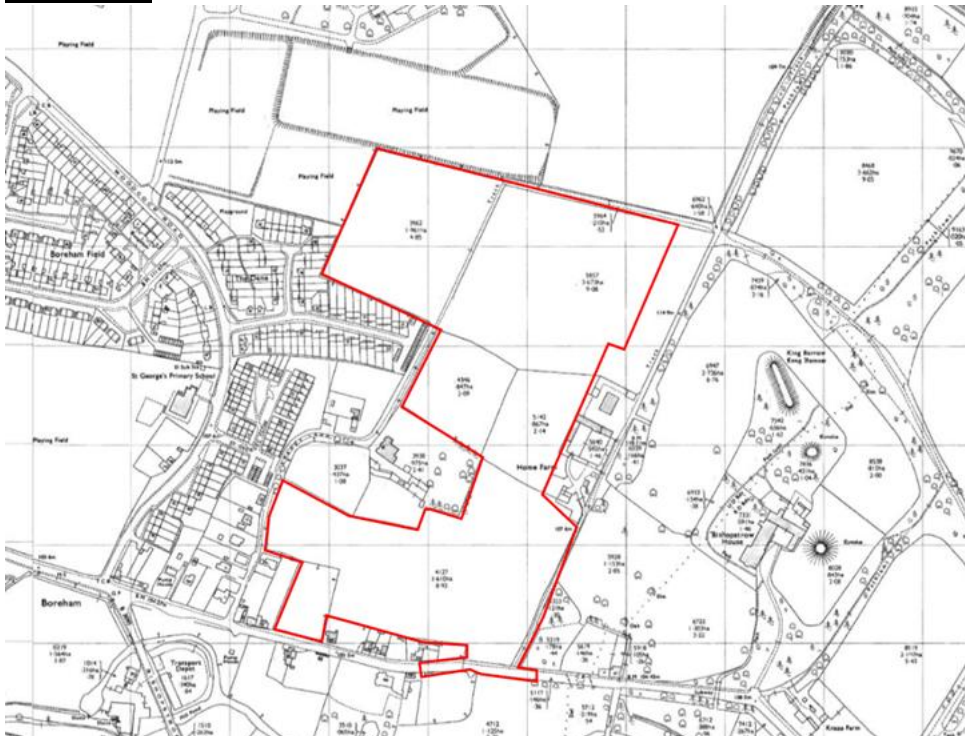
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Appendix 2



Source: EBBRAG Drone Topographical Survey – 23 Dec 25.

Dark blue colour highlighting lowest points in relation to the site layout. Note dark blue running along Boreham Road to Woodcock Road. Proposed pedestrian entrance is also dark blue.

### Appendix 3



Source: Promap